

UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: :  
CAROL A. FAUST : CHAPTER 13  
: :  
Debtor. :

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M&T BANK :  
Movant, :

vs. :  
CAROL A. FAUST : CASE NO. 5-24-03291  
Respondents. :

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**DEBTOR'S ANSWER TO MOTION FOR RELIEF FROM**  
**AUTOMATIC STAY UNDER SECTION 362**

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AND NOW COMES, Carol A. Faust, the Debtor, and files an Answer to M&T Bank's  
Motion for Relief From the Automatic Stay:

1. Carol A. Faust (hereinafter the "Debtor") filed a Chapter 13 bankruptcy proceeding with the U.S. Bankruptcy Court for the Middle District of Pennsylvania.
2. Movant alleges that Debtor has failed to make monthly payments.
3. Debtor fell behind on payments to the Movant
4. The Debtor wishes to enter into a Stipulation to include the arrears in an amended Plan.
5. Movant is not entitled to relief from the automatic stay as the arrearage amount due has been paid or shall be paid through the Chapter 13 Plan, and/or a six (6) month Stipulation, and, therefore, the Movant is adequately protected.

WHEREFORE, the Debtor respectfully requests that Movant's Motion for Relief from the Automatic Stay be denied.

Respectfully submitted,

Date: May 9, 2025

/s/Tullio DeLuca  
Tullio DeLuca, Esquire  
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Scranton, PA 18504  
(570) 347-7764

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**CERTIFICATE OF SERVICE**

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The undersigned hereby certifies that on May 9, 2025, he caused a true and correct copy of  
Debtor's Answer to Movant's Motion for Relief from the Automatic Stay to be served Via First  
Class United States Mail, Postage Pre-paid in the above-referenced case, on the following:

Jack N. Zaharopoulos, Esq. at info@pamd13trustee.com

J. Eric Kishbaugh, Esq. at bkgroup@kmlawgroup.com

Dated: May 9, 2025

/s/Tullio DeLuca  
Tullio DeLuca, Esquire